

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

RICARDO R. GARCIA, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Civil Action No. 1:19cv331-LO-MSN
	)	
VOLKSWAGEN GROUP OF AMERICA,	)	
INC. <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	

**VOLKSWAGEN AKTIENGESELLSCHAFT’S MOTION TO DISMISS PLAINTIFFS’  
AMENDED COMPLAINT PURSUANT TO FEDERAL RULES OF CIVIL  
PROCEDURE 12(B)(2) AND 12(B)(6)**

Pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6), Defendant Volkswagen Aktiengesellschaft (“VW Germany”), by counsel, respectfully moves the Court to dismiss the Amended Complaint. The grounds for dismissal are set forth in VW Germany’s accompanying Memorandum of Law in Support, which is incorporated herein by reference.

WHEREFORE, for the reasons set forth in the Memorandum of Law in Support, VW Germany requests that the Court grant its Motion and dismiss Plaintiffs’ Amended Complaint with prejudice.

Dated: November 14, 2019

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 14, 2019, I electronically filed the foregoing with the Clerk of Court using the Court's CM/ECF filing system which will send notification of electronic filing (NEF) to all counsel of record.

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